



December 30, 2014

Chairman Tom Wheeler
Federal Communications Commission
445 12th Street SW
Washington D.C. 20554

Subject: Concerns Regarding the Potential Impact of the FCC Ruling on Inmate Calling Services (ICS) Docket No. 12-375

Dear Chairman Wheeler:

As the Sheriff of Riverside County, I am writing to express my concerns regarding the impact of the FCC's potential ruling to reduce or eliminate revenue from inmate calling services. These funds are used to provide inmate programs and services in Riverside County, California.

The Riverside County Sheriff's Department is committed to the provision of quality inmate education and programming to as many inmates as is possible. Our department, which exceeds the minimum regulatory compliance for such programming, has developed successful evidenced based programs that have had a positive impact on our inmates and the lives of their families. There are many testimonials that support our commitment to inmate education and the positive effects. Our programs are designed to provide our inmates with enhanced opportunities to apply for and gain employment upon completion of their sentences. By providing these opportunities, our goal is to reduce the likelihood that inmates will recidivate and provide them with life skills which will assist them with healthy choices for decades to come.

Our Department currently provides a variety of education and inmate programs that are supported by funds received from inmate calling services. The following is a list of programs currently being delivered:

Residential Substance Abuse Treatment (RSAT)

- A 120-day evidence based program that includes; Individual Counseling, Therapeutic Groups, Substance Abuse Education, Anger Management, Domestic Violence Prevention, Relationships, Lifestyle Balance, Reentry and Transition Planning, GED Preparation and Testing, and Aftercare.

Guidance and Opportunities to Achieve Lifelong Success (GOALS)

- A comprehensive, evidence based, residential, cognitive-behavioral program delivered in 13-week phases. The program is individualized based on the needs of the individual (identified through assessment), and covers such areas as substance dependency, rational thinking, recognizing and managing high risk situations, healthy relationships, recovery maintenance, self-understanding, job readiness, transition planning and aftercare resources.

Riverside County Office of Education Services

- Programs offered include Computer Information Systems, landscape technologies, construction technologies, custodial occupations, and Graphics Technology and Print Shop, as well as independent studies such as Adult Basic Education (GED, ESL, and literacy), Parenting, Anger Management, Life Skills, and Substance Abuse Education.

Reentry services

- Includes job placement workshops, job search techniques, resume writing, interviewing skills, and job referrals

Inmate Support Services

- Including indigent barber services, release transportation vouchers, and inmate welfare packs

Other services provided are Chaplain Services, Law Library Services, Detention Volunteer Services, and Correctional Counseling.

In 1998, the Residential Substance Abuse Treatment (RSAT) program was established in collaboration with the Department of Mental Health, Drug Court, Probation Department, and Office of Education. The Riverside County Sheriff's Department devotes 64 jail beds to this intensive residential treatment program. Since the program's inception, 1,675 inmates have successfully graduated from the program. Riverside County Probation tracks recidivism rates for this program and has reported that participants completing the RSAT program have a greater probability for success, and are less likely to recidivate than those from a comparison group.

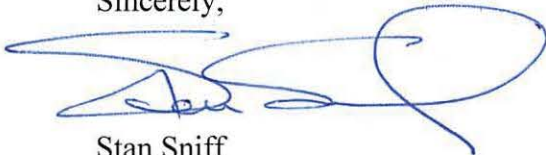
In July 2005, Riverside County Sheriff's Department entered into an agreement with the Riverside County Economic Development/Workforce Development Division to provide Reentry services to adult inmates housed in the County's detention facilities, including employability preparation workshops, resume development assistance, resource referrals, job placement assistance, and job recruitments. Since the program's beginning, approximately 4,000 inmates participated in these reentry services resulting in approximately 482 reported job placements.

The Inmate Welfare Fund (IWF) has been established pursuant to and operates in compliance with Section 4025 of the California Penal Code. It is funded in part by inmate calling services and is the primary source of funding used to provide inmate educational programs. Under my direction, the IWF is managed by a committee made up of our department's two Corrections Division Chief Deputies (Support and Operations), Corrections Division commanders, an Administrative Manager, the Sheriff's Finance Director, as well as a citizen member.

Over the past three years, the inmate phone revenue has represented a significant portion of the Riverside County Sheriff's IWF budget. The Sheriff's Department has been prudent in distributing these funds in an effort to provide quality training and direction to inmates. The results of our efforts often lead to changed lives.

We urge the FCC to reconsider eliminating revenue from inmate call services that is utilized for inmate programming. Eliminating phone revenue will have an adverse effect on the Riverside County Sheriff's Inmate Training and Education Bureau and the inmates we serve. The absence of these funds will drastically decrease our ability to maintain the level of education and treatment currently provided to our inmates; potentially increasing the recidivism rate within our county.

Sincerely,



Stan Sniff
Sheriff, Riverside County

cc: Mignon Clyburn, Commissioner
Jessica Rosenworcel, Commissioner
Ajit Pai, Commissioner
Michael O'Rielly, Commissioner
Jay Orr, CEO, Riverside County
Marion Ashley, Riverside County Board of Supervisors